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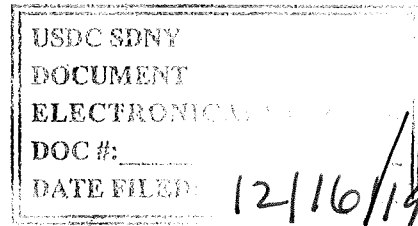
NEW YORK PENNSYLVANIA NEW JERSEY DELAWARE

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December 16, 2019

*Via CM/ECF*

Hon. Vincent L. Briccetti  
United States District Judge  
United States Courthouse  
300 Quarropas Street, Room 630  
White Plains, NY 10601



Re: *Jane Doe v. Sarah Lawrence College et al. (Case No. 7:19-cv-10028)*

Dear Judge Briccetti:

We represent the defendants in the above-referenced action. On behalf of defendants, we have agreed to accept service of process of plaintiff's Complaint, and we will be filing a Fed. R. Civ. P. 12(b)(6) motion on or before Friday, December 20, 2019. In conjunction with that motion, the defendants will file exhibits that contain highly sensitive information, including the names of plaintiff and other Sarah Lawrence College students who were involved in the underlying disciplinary proceedings, as well as other identifying information such as telephone numbers, email addresses, and dorm room information. Redacting this information, in our view, would make the documents quite cumbersome for the parties and the Court to read and utilize.

By Order dated October 31, 2019, the Court granted plaintiff's request to proceed pseudonymously in this matter. (Dkt. 5). The rationale articulated in that Order applies even more powerfully to the exhibits that defendants intend to file, given the fact that the exhibits contain identifying information not just of plaintiff, but also of students who are *not parties* to this litigation. Accordingly, defendants respectfully request permission to file their motion exhibits only under seal. So that we can present an Order to the Clerk at the time of filing, we would ask the Court to So-Order this request below if this course of action is acceptable to the Court. I have conferred with plaintiff's counsel, who consents to this request.

Respectfully,

Joshua M. Agins  
JMA/sb

CC: *Via CM/ECF*-  
James R. Marsh, Esq.  
Gina M. Decrescenzo, Esq.  
Thomas S. D'Antonio, Esq.

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APPLICATION GRANTED.

Although the relevant documents are judicial documents subject to a common law and First Amendment presumption in favor of public access, Lugosch v. Pyramid Co. of Onondaga, 435 F.3d 100, 119 (2d Cir. 2006), the Court finds defendants have shown a sufficient basis to justify filing under seal the exhibits to their anticipated motion to dismiss.

SO ORDERED:

12/16/19

Vincent L. Briccetti, U.S.D.J.

Date